## THE RAMEAU LAW FIRM

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June 8, 2016

## VIA ECF

Honorable James Orenstein United States Magistrate Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re: Jarod Skinner v. City of New York, et al., 15 CV 6126 (KAM)(JO)

## Your Honor:

I represent the plaintiff in the above-referenced matter. Pursuant to Local Civil Rule 1.4, plaintiff's attorneys make this application to be relieved as counsel. I have already informed my client and defense counsel that I will be making this application.

Given that opposing counsel is required to be served with this application and given that plaintiff's counsel does not wish to violate attorney-client privilege, counsel requests that if the Court requires the reason for the withdrawal that he be permitted to state the reasons for his application to withdraw ex parte. We have advised Mr. Skinner that we no longer wish to represent him. He in turn does feel that he has a valid case. The parties had exchanged document discovery and had scheduled depositions as discovery is set to close on June 22nd. Plaintiff's counsel is not asserting a charging or retaining lien.

As Mr. Skinner is currently incarcerated on Rikers Island and is focused on his current criminal case, we are requesting on his behalf that he be allowed 90 days to secure new counsel. The additional time is needed due to the fact that plaintiff is incarcerated, has less access to attorneys than if he was free and is focused on working with his defense counsel on his criminal case.

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We thank the Court for its consideration of this request.

Sincerely,

General Afsaan Saleem

cc: Via ECF

Aimee Lulich, Esq.

Via First Class Mail
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